

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 1:09-CIV-05583 (JFK) (GWG)

CURTIS JAMES JACKSON, III  
p/k/a 50 CENT, TOMORROW  
TODAY ENTERTAINMENT INC.,  
a New York corporation, and  
G-UNIT RECORDS, a New York  
corporation,

Plaintiffs,

v.

LEE Q. ODENAT, a/k/a "Q," d/b/a  
[WWW.WORLDSTARHIPHOP.COM](http://WWW.WORLDSTARHIPHOP.COM),  
WORLDSTAR HIP HOP, INC., a Nevada  
Corporation; WORLDSTAR, LLC, a Delaware  
limited liability company; WSHH337, LLC,  
a Delaware limited liability company;  
JOHN DOE LLC(S)/CORPORATION(S)

Defendants,

v.

YVES MONDESIR,

Third-Party Defendant.

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**DECLARATION OF ARAM SINNREICH**

I, Aram Sinnreich, hereby declare and aver as follows:

1. I am over the age of 18 years and make this declaration based on personal knowledge.
2. For the purposes of preparing my research in the matter of *Jackson v. Odenat*, I relied on several research tools and services, all of which are credible sources of data.

For information about internet traffic, I relied upon the services Alexa.com, Hitwise.com, and Compete.com.

- Alexa.com is a widely-used, freely-available source of web traffic data, co-founded by Internet Archive founder Brewster Kahle and currently owned by e-commerce giant Amazon.com. The site derives its data by tracking web use by millions of internet users. It is frequently relied upon and cited by internet researchers and marketers, and is generally considered a credible source of data.
- Hitwise.com (which has been renamed Experian Marketing Services since I used it in this matter) is a widely-used consumer insights service, offering a suite of data and analysis tools including but not limited to internet traffic and analysis. The service is owned by Experian, one of the largest and most relied-upon research firms specializing in consumer data. At the time that I used this service, I personally knew two senior executives at the company (both former colleagues of mine at a research consultancy): the VP of Data and Partnerships Luke McGuinness, and the Global Chief Marketing Officer, Marc Johnson.
- Compete.com is a widely-used consumer insights company, specializing in analyzing internet traffic. The company boasts that it has the largest panel of internet users contributing data to its database, including millions of American consumers. The company is a division of Millward Brown, the world's second largest media research organization, which is itself a business unit of WPP, the world's largest advertising company as measured by revenues. At the time I was collecting data for this case, I personally knew an executive at Compete.com:

Kevin Muoio, a former colleague, who was at the time a Sales Director, Technology and Entertainment, at the company.

3. For historical information about specific websites, I relied upon the Wayback Machine, a tool produced by Archive.org, a longstanding, widely-used, widely-respected nonprofit organization supported in part by the Kahle/Austin Foundation, the Alfred P. Sloan Foundation, and the William and Flora Hewlett Foundation. Among internet researchers, it is widely acknowledged that the Wayback Machine has the most comprehensive, most accurate collection of “snapshots” capturing the appearance of millions of websites dating back nearly two decades. According to the Archive.org website, the Wayback Machine contains almost 2 petabytes of data ( $2 \times 10^{15}$  bytes of digital information, equivalent to about 1.5 trillion floppy discs, or roughly the size of all US academic research libraries, combined) and is currently growing at a rate of 20 terabytes per month.

4. For the purpose of examining the IP address associated with WorldStarHipHop.com, I used a web service called yougetsignal.com, in addition to a number of similar websites which I did not directly cite in my written deliverables (they are largely undifferentiated, and I checked several for the sake of quality assurance). Although the noncommercial site was created by an independent computer scientist, it is one of the top 10,000 websites in the world according to Alexa.com, and has been featured as a useful tool in a variety of widely-read publications including *Popular Science* and Digg.com, which calls it a “cool webmaster tool.” The site is widely referenced and used within the web development profession; MajesticSEO, a marketing services and tools provider, lists nearly 100,000 web pages linking back to

yougetsignal.com, a basic Google search shows that the text “yougetsignal.com” appears in about 73,300 indexed pages, and, according to a search of Google Books, the website has been discussed as a useful tool in at least 14 published books about internet technology.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated September 19, 2014.

By: /s/ Aram Sinnreich  
Aram Sinnreich